REMARKS

The pending Claims are 11-20. Claims 1-10 have been deleted. No Claims have been added. Claim 11 has been amended to read "consisting essentially of" rather than the open-ended "comprising". Proper support for such a limiting claim requirement is found, at least, within the examples as a composition of water and a fiber lubricant/plasticizer alone is taught throughout. No new matter has been added. Such cancellation of Claims 1-10 renders moot the duplicative-based objections. Entry and due consideration of such amendments are therefore respectfully requested.

The Office has rejected Claims 1-20 under 35 U.S.C. § 112, first paragraph, as based upon a disclosure which is non-enabling. The Office has also rejected the same claims under the second paragraph of this statute as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Specifically, the Office states that, in both instances, there is a lack of definition for the designations of a1-a5 and b1-b5 within Formula A of the specification and claims. Applicants disagree with such a position simply because the definition of the compounds within the claims and specification rely upon a mathematical series wherein the labels of a_i and b_i provide the proper basis of these numerical designations (a1-a5 and b1-b5) through implication. The i within each of these series implies an initial starting point for each different a value (or b value). Thus, the actual range for each a1-a5 and b1-b5 is supplied within this series. Applicants can provide greater detail if such is necessary; however, it is believed that this clarification concerning the mathematical series is

sufficient to remove the non-enabling and indefinite considerations now placed thereon by the Office. As such, reconsideration and withdrawal of such rejections are earnestly solicited.

The Office has also rejected Claims 1, 2, 4, 5-7, 9-12, 14-17, 19, and 20 under 35 U.S.C. § 102(e) as being anticipated by Hart et al. Applicants respectfully disagree with such a rejection in view of the claims as now written. The presence of silicone-based compounds was noted within the specification as undesirable (doe to costs, toxicity, and other reasons). The requirement that the composition within the claimed method consist essentially of water and the particular fiber lubricant/plasticizer, in Applicants' opinion, removes such a reference due to the required presence of a water-soluble silicone. Furthermore, such a silicone appears to impart film properties to the target fabrics of patentees' as well. As such, there can be no anticipation over the pending claims as they require no film be formed during practice of the claimed method. Furthermore, as there is no suggestion of modifying patentees' compositions not to include such a film-forming constituent, there is no proper motivation provided the ordinarily skilled artisan to actually produce the currently claimed invention through review of this reference. Reconsideration and withdrawal of such a rejection are thus respectfully requested.

The Office has also rejected Claims 1, 2, 4, 6, 7, 11, 12, 14, 16, 17, and 19 under 35 U.S.C. § 103(a) as being unpatentable over WO 99/55948. In view of the amended claim language above, Applicants respectfully submit that this reference is inapplicable over the pending claims. In particular, the presence of cationic surfactants, silicone surfactants, and other materials that have been listed as specifically undesirable components within the compositions present within the claimed methods, as taught within the cited prior art reference, shows the lack of specific direction provided by this single reference to one of ordinary skill within this art to

select out of the vast array of fiber lubricants including such deleterious compounds the same exact compounds required as components within the presently claimed invention. Hence, it is Applicants opinion that this reference fails to provide a proper obviousness basis of rejection over the currently written claims. Reconsideration and withdrawal are therefore earnestly solicited of the bases of rejection relying upon this reference's laundry list of potential components without specifying the particular desire or need to select the same fiber lubricant/plasticizer components now required.

The Office has also rejected Claims 1-4, 6-9, 11-14, and 16-19 under 35 U.S.C. § 103(a) as being unpatentable over Morales. Applicants respectfully disagree with such a rejection simply because patentees clearly teach a film-forming application to fabrics for imparting wrinkle reductions and other properties. The pending claims clearly require no film be formed during performance of the claimed method, contrary to the teachings of Morales. As patentees fail to provide any motivation to omit such film-forming steps during practice of their disclosed methods, it is evident that not only is this reference inapplicable as an anticipatory teaching, but is also fails to render obvious the claimed methods as well. Reconsideration and withdrawal of such a basis of rejection are therefore respectfully requested.

CONCLUSION

In view of all of the amendments and remarks above, it is respectfully submitted that the pending claims are now in condition for allowance and it is requested that this application be passed on to issue.

Respectfully submitted,

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CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to Mail Stop Non-Fee Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on September 9, 2003, along with a postcard receipt.

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